

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☐ Record 1 of 1
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ENCLOSURE

Comments of Thomas R. Swisher, Jr., WA8PYR

In the matter of WT Docket No. 98-143, including petitions RM-9148, RM-9150 and RM-9196, adopted July 29, 1998 and released August 10, 1998.

Commenter has been a licensed amateur radio operator since 1980, having been originally licensed as KA8KCE (Novice Class), then upgrading to N8GQK (Technician Class) in 1985. Commenter now holds Technician-Plus class license with "vanity" callsign WA8PYR. Commenter is also a public safety professional, having served as a full-time police and fire dispatcher for 12 years.

Part I - Comments on Proposed Licensing Structure

In regard to the Commission's discussion regarding restructuring of the licensing classes of the Amateur Radio Service, I am in agreement with the Commission's opinion that the licensing structure of the Amateur Radio Service is in need of revision, but feel that several changes are necessary.

1. Novice, Technician and Technician-Plus Class Licenses

I agree that Technician license class should be retained as an entry-level VHF license, and that the Novice and Technician-Plus Class licenses should be phased out. However, I do not feel that "grandfathering" existing Novice and Technician-Plus licensees would be a very efficient way to simplify the licensing structure. A more appropriate alternative is presented below in connection with my comments regarding the General Class license.

2. General Class License

As to the structuring of the General Class license, I feel that some changes are necessary to the Commission's proposal. As there is a need for a "codeless" entry-level license, fulfilled by the Technician Class, there is also still a need for an entry-level HF class license. This is especially so since, as noted in sub-section E, parts 20-24 inclusive of the Commission's comments in WT Docket No. 98-143, there is a greatly diminished need for telegraphy. Telegraphy is a slow, relatively inefficient communications mode which is no longer required for communications and has for the most part been phased out by most commercial and military users in the world. That this is so is demonstrated by the fact that most maritime services, as well as the United States Navy and the United States Coast Guard, have mostly or completely phased out telegraphy operations on the HF bands. Telegraphy's day has passed, and the time has come to consider a codeless entry-level HF license.

Also, providing emergency communications is a vital facet of the Amateur Radio Service, and as a public safety professional in addition to being an amateur radio operator, I have seen this demonstrated time and again by the valuable service of radio amateurs during times of emergency when all or most other public safety and commercial communications services are unavailable or are seriously overloaded. However, this function of the Service requires not only capabilities in the bands above 50 MHz for local emergency communications, but also communication capabilities in the bands below 50 MHz, in that most long-distance emergency "nets" operate in these bands. While the large pool of Technician Class licensees is invaluable in providing local communications, the availability of licensees in possession of higher-class HF privileges is sometimes limited, leading to a shortage of operators qualified to operate on these long-distance HF "nets".

I feel that the public good and the needs of the Service would be better served by making the General Class license an entry-level HF license, with no Morse code requirement and a very stringent written examination. The General Class license should confer all privileges and power levels in the General Class sub-bands as well as in the restructured Novice/Technician Plus HF band segments as suggested below. Since Existing Novice and Technician-Plus licensees have already demonstrated basic proficiency in the International Morse Code, and are already in possession of HF and VHF CW and voice privileges (in the case of the Novice Class license, limited VHF privileges in some bands), Novice and Technician-Plus licensees should become General Class licensees. While this is an increase of HF privileges that existing Novice and Technician-Plus licensees are already in possession of, many of these licensees are already experienced operators and would fit in well on the HF bands noted below. This will serve the advantageous purposes of

simplifying the licensing structure, providing a larger available pool of operators capable of handling traffic on medium- and long-distance HF "nets", and increasing the opportunities for participation in the Amateur Radio Service.

In accordance with the phasing out of the Novice and Technician-Plus license classes and making those operators General Class licensees, and keeping in mind the diminished need for telegraphy, the existing HF sub-bands could be "refarmed" as follows:

75/80 meter band:

3575-3700 kHz	General CW/data
3525-3700 kHz	Advanced CW/data
3500-3700 kHz	Extra CW/data
3800-4000 kHz	General voice
3725-4000 kHz	Advanced voice
3700-4000 kHz	Extra voice

40 meter band:

7050-7125 kHz	General CW/data
7025-7125 kHz	Advanced CW/data
7000-7125 kHz	Extra CW/data
7200-7300 kHz	General voice
7150-7300 kHz	Advanced voice
7125-7300 kHz	Extra voice

30 meter band: No changes.

20 meter band:

14050-14150 kHz	General CW/data
14025-14150 kHz	Advanced CW/data
14000-14150 kHz	Extra CW/data
14225-14350 kHz	General voice
14175-14350 kHz	Advanced voice
14150-14350 kHz	Extra voice

17 meter band:	
18090-18110 kHz	General CW/data
18078-18110 kHz	Advanced CW/data
18068-18110 kHz	Extra CW/data
18140-18168 kHz	General voice
18125-18168 kHz	Advanced voice
18110-18168 kHz	Extra voice

15 meter band:	
21050-21150 kHz	General CW/data
21025-21150 kHz	Advanced CW/data
21000-21150 kHz	Extra CW/data
21250-21450 kHz	General voice
21175-21450 kHz	Advanced voice
21150-21450 kHz	Extra voice

12 meter band:	
24915-24930 kHz	General CW/data
24900-24930 kHz	Advanced CW/data
24890-24930 kHz	Extra CW/data
24950-24990 kHz	General voice
24940-24990 kHz	Advanced voice
24930-24990 kHz	Extra voice

10-meter band:	
28100-28300 kHz	General CW/data
28050-28300 kHz	Advanced CW/data
28000-28300 kHz	Extra CW/data
28400-29700 kHz	General voice
28350-29700 kHz	Advanced voice
28300-29700 kHz	Extra voice

Should a codeless entry-level HF class of license fail to meet the Commission's approval, I feel that a minimum requirement of 5 words-per-minute coupled with a stringent written examination would be perfectly sufficient for the entry-level General Class license.

These suggestions for the restructuring of the General Class license will not only meet the Commission's goal of simplifying the Amateur Radio Service licensing structure, but will also provide the Amateur Radio Service with a perfectly acceptable entry-level HF license class. They will also ensure that no one loses any operating privileges whatsoever, and will also, as noted above, provide a larger available pool of operators capable of handling traffic on medium- and long-distance HF "nets", and increase the opportunities for participation in the Amateur Radio Service.

3. Advanced Class License

I feel that the current Advanced Class license is in need of major changes, which will not only reflect the reduced importance of telegraphy in the communications needs of today and the future, but will also reflect the need for a corresponding increase in technical knowledge.

In regard to the CW requirement for the Advanced Class license, I feel that it would be sufficient to require a basic 5 word-per-minute CW requirement. However, commensurate with the increased operating privileges of the Advanced Class license, the written examination should be made much more challenging. While it is felt by many today that the present Advanced Class license examination is the most difficult, the new Advanced Class license should be even more challenging, with greater emphasis on technical subjects, rules and regulations, and especially proper operating

practices. The 5 word-per-minute CW requirement and a much more challenging written examination would provide a logical step up from the suggested entry-level HF license.

4. Extra Class License

Keeping in mind the need for a simplified, yet logical and orderly licensing progression in the Amateur Radio Service, I feel that the current Amateur Extra Class license is in need of some overhaul also.

The CW requirement should be lowered to 12 words-per-minute; this would still provide a more challenging step up from the Advanced Class license suggested above, yet would more accurately reflect the reduced need for telegraphy, and would fit in very well with the idea of simplifying the licensing structure.

However, in addition to the 12 word-per-minute CW requirement, the written examination should be made even more challenging than that for the Advanced Class license suggested above, with even greater emphasis on technical subjects, rules and regulations, and proper operating practices. The 12 word-per-minute CW requirement and a highly challenging written examination would not only provide a logical step up from the suggested Advanced Class license, but would also make the Amateur Extra Class license a true pinnacle of achievement for the Amateur Radio Service.

Part II - Comments on Volunteer Examiner Structure

In regard to the Commission's discussion regarding restructuring of the services of Volunteer Examiner, I am in full agreement with the Commission's opinion that changes are necessary, and feel that the changes proposed by the Commission and the American Radio Relay League are perfectly suited to the needs of the Amateur Radio Service.

Allowing Advanced Class operators who are VEs to prepare and administer examinations for a General Class operator license, and allowing General Class operator licensees to prepare and administer examinations for Technician Class operator licenses, will be a great benefit to the Amateur Radio Service by increasing the number of available Volunteer Examiners and thereby has the potential to increase the opportunities for individuals to take the necessary examinations for the Amateur Radio Service.

Part III - Conclusion

In my opinion, the proposal (with the changes suggested above) of the Commission to simplify the licensing structure of the Amateur Radio Service and the structure of the Volunteer Examiner Corps is merited, and would be of great benefit not only to the Commission in that it would significantly reduce the burden on the FCC, but would also be a great benefit to the Amateur Radio Service by simplifying the licensing structure; by continuing to provide for entry-level HF and VHF licenses; by providing for more stringent written examinations that will more accurately reflect the communications realities of the present day; and will also provide a larger available pool of operators capable of handling traffic on medium- and long-distance HF "nets", and increase the opportunities for participation in the Amateur Radio Service.

Signed,

Thomas R. Swisher, Jr.
WA8PYR